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and for Members of the Class and SubClasses

[ADDITIONAL COUNSEL ON NEXT PAGE]

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

DAVID GRAY TAYLOR, JR.,
INDIVIDUALLY, AND ON BEHALF
OF OTHER MEMBERS OF THE
PUBLIC SIMILARLY SITUTATED,

Plaintiffs,

v.

UNIFIRST CORPORATION AND
DOES 1-10, INCLUSIVE,

Defendants.

Case No. 10cv2296-lab (WMc)

**NOTICE OF JOINT MOTION
AND MOTION FOR
PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

Date: _May 2, 2011
Time: _11:15 a.m.
Courtroom: 9
Judge: Hon. Larry A. Burns

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11 Attorneys for Defendant
UniFirst Corporation
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1 TO THE COURT AND ALL INTERESTED PARTIES:

2 PLEASE TAKE NOTICE THAT on May 2, 2011, at 11:15 a.m., or as soon thereafter as
3 the matter can be heard, in Courtroom 9 of the United States District Court for the Southern
4 District of California, located at 880 Front Street, San Diego, California 92101, Plaintiff David
5 Gray Taylor, Jr. and Defendant UniFirst Corporation will, and hereby do, jointly move the Court
6 to grant preliminary approval of the parties' proposed class action settlement. Specifically, the
7 parties jointly request that the Court issue an order: (a) granting preliminary approval of the
8 proposed class settlement; (b) granting conditional certification of the settlement class; (c)
9 authorizing the mailing of the proposed class notice and claim form; and (d) scheduling a
10 "fairness hearing" for final approval of the settlement.

11 This motion is made pursuant to Rule 23(e) of the Federal Rules of Civil Procedure.

12 The parties make this motion on the grounds that the proposed settlement is fair, adequate,
13 and reasonable; it is well within the range of possible final approval; and the notice procedures
14 proposed by the parties are adequate to ensure the opportunity of class members to participate in,
15 opt out of, or object to the settlement.

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1 This motion is based upon this notice of motion and joint motion, the accompanying
2 memorandum of points and authorities in support of the motion, the declarations of London D.
3 Meservy, Terry J. Chapko, and Matthew S. Dente and attached exhibits, such evidence and
4 argument of counsel as may be presented at the hearing, the complete files and records in the
5 above-captioned matter, and such additional matters as the Court may consider.

6
7 Dated: March 7, 2011

8 MESERVY LAW, P.C.
9 THE LAW OFFICE OF TERRY J.
10 CHAPKO
11 THE DENTE LAW FIRM

12 By: s/ London D. Meservy
13 LONDON D. MESERVY
14 (SB# 216654)

15 Attorneys for Plaintiff David Gray Taylor,
16 Jr. and for Members of the Class and
17 SubClasses

18
19 Dated: March 7, 2011

20 GOODWIN PROCTER LLP

21 By: s/Bradford J. Smith
22 BRADFORD J. SMITH
23 (PRO HAC VICE)

24 Attorneys for UniFirst Corporation